

STEPHEN YAGMAN (SBN 69737)
filing@yagmanlaw.net
YAGMAN + REICHMANN, LLP
333 Washington Boulevard
Venice Beach, California 90292-5152
(310)452-3200

Presented on behalf of Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

**PEOPLE OF LOS ANGELES WHO ARE
UN-HOUSED, AS A CLASS REPRESENTED
BY C. FINLEY, *etc.*,**

Plaintiff,

v.

ERIC MICHAEL GARCETTI, *et al.*,

Defendants.

21-cv-06003-DOC

**DECLARATION OF
PLAINTIFF, C. FINLEY**

DECLARATION OF C. FINLEY

I, C. FINLEY, declare the following to be true under the penalty of perjury at Venice Beach, California, pursuant to 28 U.S.C. § 1746, on the date set forth below my signature hereinbelow.

1. I am the plaintiff in this action.

2. Some time ago, I was evicted from the apartment in which I lived, in Venice, California.

3. Since that time, I have been living in an RV, that I park on public streets, in Venice.

4. There are very many streets on which I wish to park, but on which I am prohibited from parking the RV, because those streets are posted with no-parking signs that prohibit parking of vehicles that are more than seven feet in height or more than 22 feet in length, between the hours of 2:00 a.m. and 6:00 a.m., upon penalty of a citation and fine or being towed away by the City of Los Angeles and Bruffy's tow company. Those signs all look like Exhibit 1 to the complaint, and there are hundreds of them around Venice.

5. Those signs very obviously target un-housed people, like me, who don't have traditional housing and who live in RVs, campers, trailers, and the like, of which there appear to be at least scores in Venice.

6. I want to be able to park the RV in which I live on many of the streets in Venice on which parking my RV is prohibited, because those streets are much, much closer to the beach, where there are both public bathing (showers) and toilet facilities, that I want to use, and which are not close by to where I now park the RV, and which I, therefore, am unable to utilize.

7. I am a poor person, with no regular income and virtually no monetary resources, as is evidenced by my application to proceed in this action *in forma pauperis*, Doc. 4, whose contents are incorporated herein by this reference, and I

1 am being discriminated against because of my poor financial condition by the no
2 parking signs that prohibit me from parking on public streets in places in Venice, at
3 which I would have better access to public showers at which I want to bathe and
4 could bathe, and public toilets which I want to use and could use.

5
6
7 /s/ C. Finley

8 **C. FINLEY** 08/16/21
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28 //

CERTIFICATE OF SERVICE

I, STEPHEN YAGMAN, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that I served a copy of the foregoing declaration on City of Los Angeles deputy City attorney Scott D. Marcus, Chief, Civil Litigation Branch, and with whom I held the L.R. 7-3 meeting in this action, by emailing it to him at scott.marcus@lacity.org. He is registered with the court's electronic filing system, and thus has agreed to accept electronic service of papers filed.



STEPHEN YAGMAN 08/16/21